

## REMARKS

Applicants request favorable reconsideration and withdrawal of the rejections set forth in the above-noted Office Action, in light of the foregoing amendments and the following remarks.

Claims 1-12, 14, 15, and 17-26 are presented for examination, with claims 1 and 12 being independent. Claims 13 and 16 are canceled herein. Claims 1, 12, 15, and 19-23 have been amended to emphasize the novelty of Applicants' invention over the cited art. Support for these amendments may be found at paragraphs [0011], [0014], and [0018], and Fig. 1 of Applicant's published specification. Claim 6 has been amended solely to improve its form. No new matter has been added by any amendment.

Claims 1-26 are newly rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2002/0049853 (Chu) in light of U.S. Patent No. 6,965,569 (Carolan). Without conceding the propriety of the rejections, Applicants submit that the independent claims, as amended, demonstrate the patentability of the present invention over the cited art. Applicants further submit that dependent claims 18, 22, and 23 are patentable because the cited art does not teach or suggest features of the invention recited in these claims.

Independent claim 1 recites that a system to facilitate movement of electronic files includes, among other components, a file transfer services component and a file transformation component. The file transfer services component is configured to transmit and/or receive a file request. The file transformation component is configured to use enterprise logic to enrich file content and to convert a file type to another file type. The file transfer services component provides an entry point into the system to a user, while

the file transformation component does not. Thus, a user can access the system of claim 1 via the file transfer services component, but not via the file transformation component.

The Chu publication fails to teach or suggest the file transformation component recited in claim 1. The file system described by Chu comprises a sending device, a receiving device, a DAD server, and a remote server file storage system, as shown in Fig. 1. The Office Action relies on the sending device to teach a file transformation component. Specifically, the Office Action identifies the functions of client software on the sending device as using enterprise logic to enrich file content. However, Chu states at paragraph [0051] that the sending device is operated by a user. Beginning at paragraph [0054], Chu describes how a user can access the file system from the sending device. Thus, the sending device provides an entry point into the Chu system to a user. However, the file transformation component recited in claim 1 is configured such that it does not provide an entry point to a user. Therefore, the file transformation component recited in claim 1 does not read on the sending device and client software disclosed by Chu.

The secondary citation to Carolan fails to compensate for this deficiency of Chu. The Office Action relies on the abstract of Carolan to teach the conversion of a file type to another file type. No component of the Carolan system is identified as a file transformation component. Moreover, nothing in Carolan teaches or suggests a component enriching file content using enterprise logic. Applicants thus submit that the cited art, whether taken alone or in combination, neither anticipates nor renders obvious the system recited in claim 1.

Claim 12 recites a method to facilitate the movement of electronic files within a system. Claim 12 has been amended to recite features similar to those discussed above

with respect to claim 1. Therefore, the reasoning set forth above with respect to claim 1 is similarly applicable to claim 12.

The remaining rejected claims in this application depend from either Claim 1 or Claim 12, and are thus submitted to be patentable at least due to their dependency on a patentable independent claim. Moreover, Applicants request individual reconsideration of dependent claims 18, 22, and 23, for the following reasons.

Dependent claim 18 recites that a feature of an embodiment of the invention is a validating step, which includes ensuring that data of a file content includes syntactical integrity as received from a client. Chu does not teach or suggest this feature. At paragraph [0106], Chu discloses a client computer reading data received at the computer's socket from a DAD server and indicating whether the data at the socket is valid. While Chu may discuss data validity in connection with file content received at a client, Chu does not teach or suggest any validating step performed on data received from a client. Carolan does not discuss data validity in any context. Therefore, the embodiment recited in claim 18 is patentable.

Dependent claim 22 recites a feature pertaining to at least one of the steps of file converting, validating, and enriching in an embodiment of the invention. In particular, at least one of these steps uses one of meta-data and business mapping rules to describe how enterprise logic is applied. Page 6 of the Office Action states that the reports, articles, advertisements, and spreadsheets (collectively, "complex documents") disclosed by Chu anticipate a business mapping rule. However, paragraphs [0054] and [0108] of Chu, which are identified as anticipating the claimed enriching and validating steps, respectively, contain no disclosure as to how Chu's client software uses complex

documents to describe how enterprise logic enriches or validates file content. Similarly, the abstract of Carolan does not disclose how the Carolan system uses a complex document to describe how enterprise logic converts a file type of a file to another file type. Therefore, the embodiment recited in claim 22 is patentable.

Dependent claim 23 recites another feature pertaining to at least one of the steps of file converting, validating, and enriching in an embodiment of the invention. In particular, at least one of these steps uses a business rules definitions tool to define the enterprise logic. The Office Action states that the complex documents disclosed in Chu further anticipate a business mapping definitions tool. As discussed with respect to claim 22, there is nothing in Chu that discloses using a complex document to define enterprise logic when enriching or validating file content, and there is nothing in Carolan that discloses using a complex document to define enterprise logic when converting a file type of a file to another file type. Therefore, the embodiment recited in claim 23 is patentable.

For at least the reasons above, Applicants submit that the rejections set forth in the above-noted Office Action have been overcome, and thus the application is in condition for allowance. Applicants request favorable reconsideration, withdrawal of the rejections, and an early Notice of Allowance.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

/Lawrence A Stahl/

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Lawrence A. Stahl  
Attorney for Applicants  
Registration No. 30,110

FITZPATRICK, CELLA, HARPER & SCINTO  
30 Rockefeller Plaza  
New York, New York 10112-3801  
Facsimile: (212) 218-2200

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